

CALFRESH REQUEST FOR POLICY INTERPRETATION**PI# 17-87**

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Retain a copy for your records and submit via email to CalFresh-PI@dss.ca.gov.

Please note: the policy interpretation provided is based on the unique set of facts presented and should not be assumed to apply in all scenarios.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Other:		5. DATE OF REQUEST: 10/18/2017	NEED RESPONSE BY: 10/27/2017
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION: Madera County DSS	
3. PHONE NO.:	EMAIL:	7. SUBJECT: CF and The WORK Number	
4. REGULATION CITE(S):		8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACL 16-118, 16-43, ACWDL Dated 01/13/2016, ACIN I-41-14	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

CF is a single signature program so do we need a release of information from each HH member over 18 years old to access the WORK Number?

Scenario:

There is a HH with 4 adults receiving CF. Only the applicant signed the CF application. Does that single signature allow for use of the WORK Number for all HH members?

10. REQUESTOR'S PROPOSED ANSWER:

In order to use the WORK Number we must have "written authorization from the Consumer to verify income". Since we only have the applicants signature we can ONLY use the WORK Number for the applicant. We would need a signed release for each household member to request their information.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

ACL 16-77, page four states that upon signing the CF 285, CF 37, SAWS 1, or SAWS 2Plus, applicants and recipients have acknowledged the added disclosure (see below). Therefore, CWDs are authorized to access information from the Work Number without having to obtain a separate written authorization from applicants and recipients. The WN can be used for initial and ongoing eligibility, along with fraud detection, in conjunction with and not in lieu of, existing required income and eligibility verification sources.

The disclosure states, "The County will check your answers using information in state and federal electronic databases and databases from the Internal Revenue Service (IRS), Social Security Administration, the Department of Homeland Security, and/or a consumer reporting agency. If the information doesn't match, the County may ask you to send proof."

FOR CDSS USE

DATE RECEIVED:

10/23/2017

DATE RESPONDED TO COUNTY/ALJ:

10/30/2017 RA